

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

CANDY M. SOUSA, On Behalf of Herself and)	No. 04-30022-MAP
All Others Similarly Situated,	)
	)
Plaintiff,	)
	)
vs.	)
	)
WAVE SYSTEMS CORPORATION, et al.,	)
	)
Defendants.	)
	)
<hr/> YOSEF STREICHER, On Behalf of Himself	No. 04-30026-KPN
and All Others Similarly Situated,	)
	)
Plaintiff,	)
	)
vs.	)
	)
WAVE SYSTEMS CORPORATION, et al.,	)
	)
Defendants.	)
	)
<hr/>	)

[Caption continued on following page.]

AFFIDAVIT OF NANCY GANS IN SUPPORT OF LEAD PLAINTIFF MOTION

RAFAT DAWOD, Individually and On Behalf of All Others Similarly Situated,	)	Civil Action No. 04-30029-KPN
	)	
Plaintiff,	)	<u>CLASS ACTION</u>
	)	
vs.	)	
	)	
WAVE SYSTEMS CORPORATION, et al.,	)	
	)	
Defendants.	)	
	)	
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ALVIN CHESS, Individually and On Behalf of All Others Similarly Situated,	)	Civil Action No. 04-30037-MAP
	)	
Plaintiff,	)	<u>CLASS ACTION</u>
	)	
vs.	)	
	)	
WAVE SYSTEMS CORPORATION, et al.,	)	
	)	
Defendants.	)	
	)	
<hr/>		
MICHAEL D. VICKER, On Behalf of Himself and All Others Similarly Situated,	)	Civil Action No. 04-30040-MAP
	)	
Plaintiff,	)	<u>CLASS ACTION</u>
	)	
vs.	)	
	)	
WAVE SYSTEMS CORPORATION, et al.,	)	
	)	
Defendants.	)	
	)	
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[Caption continued on following page.]

H. MARTIN BOHMAN, On Behalf of Himself) Civil Action No. 04-30041-MAP  
and All Others Similarly Situated, )

Plaintiff, )

vs. )

WAVE SYSTEMS CORPORATION, et al., )

Defendants. )

CLASS ACTION

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JIMMY SUO, On Behalf of Himself and All ) Civil Action No. 04-30042-MAP  
Others Similarly Situated, )

Plaintiff, )

vs. )

WAVE SYSTEMS CORPORATION, et al., )

Defendants. )

CLASS ACTION

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JACK SCHULMAN, Individually and On ) Civil Action No. 04-30043-MAP  
Behalf of All Others Similarly Situated, )

Plaintiff, )

vs. )

WAVE SYSTEMS CORPORATION, et al., )

Defendants. )

CLASS ACTION

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I, NANCY GANS, declare as follows:

1. I am an attorney duly licensed to practice before all of the courts of the State of California. I am a member of the law firm of Moulton & Gans, one of the proposed liaison counsel of record for plaintiff in the above-entitled action. I have personal knowledge of the matters stated herein and, if called upon, I could and would competently testify thereto.

2. Attached are true and correct copies of the following exhibits:

- Exhibit A: Sworn Certifications of Rogers and Alvarez;
- Exhibit B: Chart of Rogers' and Alvarez's Purchases and Losses;
- Exhibit C: Notice of pendency of class action published on *Business Wire*, a national, business-oriented newswire service, on February 4, 2004;
- Exhibit D: Milberg Weiss firm resume; and
- Exhibit E: Moulton & Gans firm resume..

I declare under penalty of perjury under the laws of the State of Massachusetts that the foregoing is true and correct. Executed this 5th day of April, 2004, at Boston, Massachusetts.

\_\_\_\_\_  
/S/ NANCY GANS  
NANCY GANS

DECLARATION OF SERVICE BY FEDERAL EXPRESS AND FACSIMILE

I, the undersigned, declare:

1. That declarant is and was, at all times herein mentioned, a citizen of the United States and employed in the City and County of San Francisco, over the age of 18 years, and not a party to or interest in the within action; that declarant's business address is 100 Pine Street, Suite 2600, San Francisco, California 94111.

2. That on April 5, 2004, declarant served the **AFFIDAVIT OF NANCY GANS IN SUPPORT OF LEAD PLAINTIFF MOTION** by Federal Express at San Francisco, California in a sealed envelope with postage thereon fully prepaid and addressed to the parties listed on the attached Service List. Declarant also served the parties by facsimile.

3. That there is a regular communication by mail between the place of mailing and the places so addressed.

I declare under penalty of perjury that the foregoing is true and correct. Executed this 5th day of April, 2004, at San Francisco, California.

/S/ DEBORAH DASH

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DEBORAH DASH

WAVE SYSTEMS (Mass)

Service List - 4/2/2004 (04-0046M)

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WAVE SYSTEMS (Mass)

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WAVE SYSTEMS (Mass)

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